

**BROADCAST EQUAL EMPLOYMENT OPPORTUNITY  
MODEL PROGRAM REPORT**

1. APPLICANT

|  |   |
|--|---|
| Name of Applicant<br><br>Four Jacks Broadcasting, Inc. | Address<br><br>2000 West 41st Street<br>Baltimore, MD 21211 |
| Telephone Number (include area code)<br>(301) 467-4545 |   |

2. This form is being submitted in conjunction with:

☒ Application for Construction Permit for New Station      ☐ Application for Assignment of License

☐ Application for Transfer of Control

(a) Call letters (or channel number or frequency) ..... Channel 2+

(b) Community of License (city and state) ..... Baltimore, Maryland

(c) Service:      ☐ AM      ☐ FM      ☒ TV      ☐ Other (Specify) \_\_\_\_\_

**INSTRUCTIONS**

Applicants seeking authority to construct a new commercial, noncommercial or international broadcast station, applicants seeking authority to obtain assignment of the construction permit or license of such a station, and applicants seeking authority to acquire control of an entity holding such construction permit or license are required to afford equal employment opportunity to all qualified persons and to refrain from discrimination in employment and related benefits on the basis of race, color, religion, national origin or sex. See Section 73.2080 of the Commission's Rules. Pursuant to these requirements, an applicant who proposes to employ five or more full-time employees must establish a program designed to assure equal employment opportunity for women and minority groups (that is, Blacks not of Hispanic origin, Asians or Pacific Islanders, American Indians or Alaskan Natives and Hispanics). This is submitted to the Commission as the Model EEO Program. If minority group representation in the available labor force is less than five percent (in the aggregate), a program for minority group members is not required. In such cases, a statement so indicating must be set forth in the EEO model program. However, a program must be filed for women since they comprise a significant percentage of virtually all area labor forces. If an applicant proposes to employ fewer than five full-time employees, no EEO program for women or minorities ed be filed.

**Guidelines for a Model EEO Program and a Model EEO Program are attached.**

**NOTE:** Check appropriate box, sign the certification below and return to FCC:

- ☐ Station will employ fewer than 5 full-time employees; therefore no written program is being submitted.
- ☒ Station will employ 5 or more full-time employees. Our Model EEO Program is attached. (You must complete all sections of this form.)

I certify that the statements made herein are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signed and dated this 3<sup>rd</sup> day of September, 1991

Signed Robert E. Smith

Title Vice-President

**WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.  
U.S. CODE, TITLE 18, SECTION 1001.**

## **GUIDELINES TO THE MODEL EEO PROGRAM**

The model EEO program adopted by the Commission for construction permit applicants, assignees and transferees contains five sections designed to assist the applicant in establishing an effective EEO program for its station. The specific elements which should be addressed are as follows:

### **I. GENERAL POLICY**

The first section of the program should contain a statement by the applicant that it will afford equal employment opportunity in all personnel actions without regard to race, color, religion, national origin or sex, and that it has adopted an EEO program which is designed to fully utilize the skills of qualified minorities and women in the relevant available labor force.

### **II. RESPONSIBILITY FOR IMPLEMENTATION**

This section calls for the name (if known) and title of the official who will be designated by the applicant to have responsibility for implementing the station's program.

### **III. POLICY DISSEMINATION**

The purpose of this section is to disclose the manner in which the station's EEO policy will be communicated to employees and prospective employees. The applicant's program should indicate whether it: (a) intends to utilize an employment application form which contains a notice informing job applicants that discrimination is prohibited and that persons who believe that they have been discriminated against may notify appropriate governmental agencies; (b) will post a notice which informs job applicants and employees that the applicant is an equal opportunity employer and that they may notify appropriate governmental authorities if they believe that they have been discriminated against; and (c) will seek the cooperation of labor unions, if represented at the station, in the implementation of its EEO program and in the inclusion of nondiscrimination provisions in union contracts. The applicant should also set forth any other methods it proposes to utilize in conveying its EEO policy (e.g., orientation materials, on announcements, station newsletter) to employees and prospective employees.

### **IV. RECRUITMENT**

The applicant should specify the recruitment sources and other techniques it proposes to use to attract qualified minority and female job applicants. Not all of the categories of recruitment sources need be utilized. The purpose of the listing is to assist the applicant in developing specialized referral sources to establish a pool of qualified minorities and women who can be contacted as job opportunities occur. Sources which subsequently prove to be nonproductive should not be relied on and new sources should be sought.

### **V. TRAINING**

Training programs are not mandatory. Each applicant is expected to decide, depending upon its own individual situation, whether a training program is feasible and would assist in its effort to increase the available pool of qualified minority and female applicants. Additionally, the applicant may set forth any other assistance it proposes to give to students, schools or colleges which is designed to be of benefit to minorities and women interested in entering the broadcasting field. The beneficiary of such assistance should be listed, as well as the form of assistance, such as contributions to scholarships, participation in work study programs, and the like.

## **MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM**

### **I. GENERAL POLICY**

It will be our policy to provide employment opportunity to all qualified individuals without regard to their race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have adopted an Equal Employment Opportunity Program which includes the following elements:

### **II. RESPONSIBILITY FOR IMPLEMENTATION**

(Name/Title) David D. Smith, General Manager, will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

### **III. POLICY DISSEMINATION**

To assure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

- ☒ The station's employment application form will contain a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, State or Federal agency if they believe they have been the victims of discrimination.
- ☒ Appropriate notices will be posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, State or Federal agency if they believe they have been the victims of discrimination.
- ☐ We will seek the cooperation of unions, if represented at the station, to help implement our EEO program and all union contracts will contain a nondiscrimination clause.
- ☐ Other (specify)

#### IV. RECRUITMENT

To ensure nondiscrimination in relation to minorities and women, and to foster their full consideration whenever job vacancies occur, we propose to utilize the following recruitment procedures:

- ☒ We will contact a variety of minority and women's organizations to encourage the referral of qualified minority and women applicants whenever job vacancies occur. Examples of organizations we intend to contact are:

Baltimore Urban League  
Association of Black Media Workers  
Urban Services Agency of Baltimore City  
Maryland New Directions for Women  
American Women in Radio and Television  
Bethel Christian Employment Outreach  
Archdiocesan Hispanic Center

- ☒ In addition to the organizations noted above, which specialize in minority and women candidates, we will deal only with employment services, including State employment agencies, which refer job candidates without regard to their race, color, religion, national origin or sex. Examples of these employment referral services are:

Maryland Department of Employment and Training

- ☒ When we recruit prospective employees from educational institutions such recruitment efforts will include area schools and colleges with minority and women enrollments. Educational institutions to be contacted for recruitment purposes are:

Coppin State College  
Community College of Baltimore  
Morgan State University  
University of Maryland  
College of Notre Dame

- ☒ When we place employment advertisements with media some of such advertisements will be placed in media which have significant circulation or viewership or are of particular interest to minorities and women. Examples of media to be utilized are:

Baltimore Sun

- ☒ We will encourage employees to refer qualified minority and women candidates for existing and future job openings.

## V. TRAINING

- ☐ Station resources and/or needs will be such that we will be unable or do not choose to institute programs for upgrading the skills of employees.
- ☐ We will provide on-the-job training to upgrade the skills of employees.
- ☒ We will provide assistance to students, schools, or colleges in programs designed to enable qualified minorities and women to compete in the broadcast employment market on an equitable basis:

### School or Other Beneficiary

Mathematics, Engineering &  
Science Association

### Proposed Form of Assistance

Julian Sinclair Smith Scholarship  
(two awarded to deserving minority  
students interested in engineering  
and mathematics)

- ☐ Other (specify)

## FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the application requested is consistent with the public interest. The staff, consisting variously of attorneys, analysts, engineers, and applications examiners, will use the information to determine whether the application should be granted, denied, dismissed, or designated for hearing. If all the information requested is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested authority.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

ORIGINAL

ENGINEERING EXHIBIT

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FCC Form 301, Section V-C

Statement of Herman E. Hurst, Jr.

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# Section V-C - TV BROADCAST ENGINEERING DATA

FOR COMMISSION USE ONLY

File No. \_\_\_\_\_

ASB Referral Date \_\_\_\_\_

Referred by \_\_\_\_\_

Name of Applicant

Four Jacks Broadcasting, Inc.

Call letters (if issued)

N/A

Purpose of Application (check appropriate box):

☒ Construct a new (main) facility

☐ Construct a new auxiliary facility

☐ Modify existing construction permit for main facility

☐ Modify existing construction permit for auxiliary facility

☐ Modify licensed main facility

☐ Modify licensed auxiliary facility

If purpose is to modify, indicate nature of change(s) by checking appropriate box(es), and specify the file number(s) of the authorization(s) affected:

☐ Antenna supporting-structure height

☐ Effective radiated power

☐ Antenna height above average terrain

☐ Frequency

☐ Antenna location

☐ Antenna system

☐ Main Studio location

☐ Other (Summarize briefly)

File Number(s) \_\_\_\_\_

## 1. Allocation:

| Channel No. | Offset<br>(check one)                    | Principal community to be served: |           |       | Zone<br>(check one)                   |
|-------------|--|-----------------------------------|-----------|-------|---------------------------------------|
|             | <input checked="" type="checkbox"/> Plus | City                              | County    | State | <input checked="" type="checkbox"/> I |
|             | <input type="checkbox"/> Minus           | Baltimore                         | Baltimore | MD    | <input type="checkbox"/> II           |
| 2           | <input type="checkbox"/> Zero            |                                   |           |       | <input type="checkbox"/> III          |

## 2. Exact location of antenna:

(a) Specify address, town or city, county and state. If no address, specify distance and bearing to the nearest landmark.

1200 North Rolling Road, Catonsville, Baltimore, Maryland

(b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates of center of array. Otherwise, specify tower location. Specify South Latitude or East Longitude where applicable; otherwise, North Latitude and West Longitude will be presumed.

|          |    |   |    |   |    |   |           |    |   |    |   |    |   |
|----------|----|---|----|---|----|---|-----------|----|---|----|---|----|---|
| Latitude | 39 | ° | 17 | ' | 13 | " | Longitude | 76 | ° | 45 | ' | 16 | " |
|----------|----|---|----|---|----|---|-----------|----|---|----|---|----|---|

3. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)? ☒ Yes ☐ No

If Yes, give call letter(s) or file number(s) or both.

WPOC (FM)

If proposal involves a change in height of an existing structure, specify existing height above ground level, including antenna, all other appurtenances, and lighting, if any.

N/A

4. Does the application propose to correct previous site coordinates?

☐ Yes ☒ No

If Yes, list old coordinates.

|          |   |   |   |           |   |   |   |
|----------|---|---|---|-----------|---|---|---|
| Latitude | ° | ' | " | Longitude | ° | ' | " |
|----------|---|---|---|-----------|---|---|---|

5. Has the FAA been notified of the proposed construction?

☐ Yes ☒ No

If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available. See Engineering Statement

Exhibit No.  
N/A

Date \_\_\_\_\_ Office where filed \_\_\_\_\_

6. List all landing areas within 8 km of antenna site. Specify distance and bearing from structure to nearest point of the nearest runway. There are no landing areas within 8 km of the proposed site.

| Landing Area | Distance (km) | Bearing (degrees True) |
|--------------|---------------|------------------------|
| (a) _____    | _____         | _____                  |
| (b) _____    | _____         | _____                  |

7. (a) Elevation: (to the nearest meter)

(1) of site above mean sea level; 165 meters(2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and 216 meters(3) of the top of supporting structure above mean sea level  $[(a)(1) + (a)(2)]$ . 381 meters

(b) Height of antenna radiation center: (to the nearest meter)

(1) above ground; 198 meters(2) above mean sea level  $[(a)(1) + (b)(1)]$ ; and 363 meters(3) above average terrain. 267 meters

8. Attach as an Exhibit sketch(es) of the supporting structure, labelling all elevations required in Question 7 above, except item 7(b)(3). If mounted on an AM directional-array element, specify heights and orientations of all array towers, as well as location of TV radiator.

Exhibit No.  
19. Maximum visual effective radiated power 100.0 kW

## 10. Antenna:

(a) Manufacturer LDL (b) Model No. Superturnstile

(c) Is a directional antenna proposed?

☐ Yes ☒ NoIf Yes, specify major lobe azimuth(s) N/A degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.Exhibit No.  
N/A

(d) Is electrical beam tilt proposed?

☒ Yes ☐ NoIf Yes, specify 0.5 degrees electrical beam tilt and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.Exhibit No.  
4

(e) Is mechanical beam tilt proposed?

☐ Yes ☒ NoIf Yes, specify N/A degrees mechanical beam tilt toward azimuth N/A degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.Exhibit No.  
N/A

(f) The proposed antenna is: (check only one box)

☒ horizontally polarized ☐ circularly polarized ☐ elliptically polarized

11. Will the proposed facility satisfy the requirements of 47 C.F.R. Sections 73.685(a) and (b)?

☒ Yes ☐ No

If No, attach as an Exhibit justification therefor, including amounts and percentages of population and area that will not receive City Grade service.

Exhibit No.  
N/A

12. Will the main studio be located within the station's predicted principal community contour as defined by 47 C.F.R. Section 73.685(a)?

☒ Yes ☐ No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1125.

Exhibit No.  
N/A

13. Does the proposed facility satisfy the requirement of 47 C.F.R. Section 73.610?

☒ Yes ☐ No

If No, attach as an Exhibit justification therefor, including a summary of any previously granted waiver(s).

Exhibit No.  
N/A

14. Are there: (a) within 60 meters of the proposed antenna, any proposed or authorized FM or TV transmitters; or (b) in the general vicinity, any nonbroadcast (except citizens band or amateur) radio stations or any established commercial or government receiving stations?

☒ Yes ☐ No

If Yes, attach as an Exhibit a description of the expected, undesired effects of operations and remedial steps to be pursued, if necessary, and a statement accepting full responsibility for the elimination of any objectionable interference (including that caused by intermodulation) to facilities in existence or authorized prior to grant of this application. (See 47 C.F.R. Sections 73.685(d) and (g).)

Exhibit No.  
See Engrng  
Statement

15. Attach as an Exhibit a topographic map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the provisions of 47 C.F.R. Section 73.684(g). The map must further display clearly and legibly the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No.  
2

16. Attach as an Exhibit a map (Sectional Aeronautical Chart or equivalent) which shows clearly, legibly and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers.

|                  |
|------------------|
| Exhibit No.<br>3 |
|------------------|

- (a) The proposed transmitter location, and the radials along which profile graphs have been prepared;  
 (b) The City Grade, Grade A and Grade B predicted contours; and  
 (c) The legal boundaries of the principal community to be served.

17. Specify area in square kilometers (1 sq. mi. = 259 sq. km.) and population (latest census) within the predicted Grade B contour.

Area 29,534 sq. km. Population 6,458,755

18. For an application involving an auxiliary facility only, attach as an Exhibit a map (Sectional Aeronautical Chart or equivalent) that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers.

|                    |
|--------------------|
| Exhibit No.<br>N/A |
|--------------------|

- (a) The proposed auxiliary Grade B contour; and  
 (b) The Grade B contour of the licensed main facility for which the applied-for facility will be the auxiliary.

(Main facility license file number N/A)

19. Terrain and Coverage Data (To be calculated in accordance with 47 C.F.R. Section 73.684.)

Source of terrain data: (check only one box below)

- ☒ Linearly interpolated 30-second database (Source: National Geophysical Thirty-Second Point Topographic Database (TPG-0050))  
☐ 7.5 minute topographic map  
☐ Other (briefly summarize)

| Radial bearing<br>(degrees True) | Height of radiation center<br>above average elevation of<br>radial from 3 to 16 km<br>(meters) | Predicted Distances                          |   |   |
|----------------------------------|--|--|---|---|
|                                  |  | To the City<br>Grade Contour<br>(kilometers) | To the Grade<br>A Contour<br>(kilometers) | To the Grade<br>B Contour<br>(kilometers) |
| *                                |  |  |   |   |
| 0                                | 220  | 37.0   | 48.6                                      | 96.0                                      |
| 45                               | 249  | 39.0   | 50.8                                      | 98.9                                      |
| 90                               | 322  | 43.3   | 55.8                                      | 105.3                                     |
| 135                              | 320  | 43.2   | 55.7                                      | 105.1                                     |
| 180                              | 296  | 41.8   | 54.1                                      | 103.2                                     |
| 225                              | 252  | 39.2   | 51.0                                      | 99.2                                      |
| 270                              | 235  | 38.1   | 49.8                                      | 97.5                                      |
| 315                              | 238  | 38.3   | 50.0                                      | 97.8                                      |

\*Radial through principal community, if not one of the major radials. This radial should NOT be included in calculation of HAAT.

SECTION V-C - TV BROADCAST ENGINEERING DATA (Page 5)

20. Environmental Statement/(See 47 C.F.R. Section 1.1301 et seq.)

Would a Commission grant of this application come within 47 C.F.R. Section 1.1307, such that it may have a significant environmental impact?

☐ Yes ☒ No

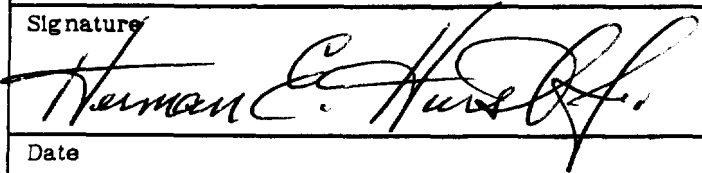
If you answer Yes, submit as an Exhibit an Environmental Assessment required by 47 C.F.R. Section 1.1311.

Exhibit No.  
N/A

If No, explain briefly why not. See Engineering Statement

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

|   |   |
|---|---|
| Name (Typed or Printed)<br>Herman E. Hurst, Jr.   | Relationship to Applicant (e.g., Consulting Engineer)<br>Technical Consultant                           |
| Signature<br> | Address (Include ZIP Code)<br>Carl T. Jones Corporation<br>7901 Yarnwood Court<br>Springfield, VA 22153 |
| Date<br>August 29, 1991   | Telephone No. (Include Area Code)<br>(703) 569-7704   |

***CARL T. JONES***  
***CORPORATION***

**STATEMENT OF HERMAN E. HURST, JR.  
IN SUPPORT OF AN  
APPLICATION FOR CONSTRUCTION PERMIT  
NEW TV STATION - BALTIMORE, MARYLAND  
CHANNEL 2+ - 100.0 kW - 267 METERS HAAT**

**Applicant: Four Jacks Broadcasting, Inc.**

I am a Radio Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia.

My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by Four Jacks Broadcasting, Inc. to prepare this statement and the associated exhibits in support of an Application for Construction Permit for a new Television station on Channel 2+ to serve Baltimore, Maryland.

The applicant proposes to mount a new TV antenna atop an existing tower structure. The antenna will be added and the existing tower altered such that the overall height of the tower does not change. Attached as Exhibit 2 is a full-size copy of a 7.5 minute U.S. Geological Survey topographic map depicting the proposed site location and surrounding terrain.

**ALLOCATION STUDY**

A frequency allocation study was performed to ensure that the proposed transmitter site location meets all of the Commission's minimum distance separation requirements.

STATEMENT OF HERMAN E. HURST, JR.  
NEW TV STATION - BALTIMORE, MARYLAND  
PAGE 2

Under Section 73.610 of the FCC Rules, the proposed facility would be short-spaced to cochannel television station WMAR-TV, Baltimore, Maryland. The instant proposal is being filed mutually-exclusive with the renewal application of WMAR-TV. The proposed transmitter site is fully-spaced with respect to all other co-channel and adjacent channel facilities, allotments, and proposals.

TECHNICAL FACILITIES

The applicant proposes to utilize an LDL Superturnstile omnidirectional, horizontally polarized antenna with 0.5 degrees of electrical beam tilt. Exhibit 4 is the proposed vertical radiation pattern supplied by the manufacturer. The new TV antenna will be mounted atop the existing tower structure. The tower will be modified such that the addition of the transmitting antenna will not increase the overall height of the tower. The proposed height of the antenna radiation center is 198 meters Above Ground Level (AGL) and 363 meters Above Mean Sea Level (AMSL). The resulting antenna Height Above Average Terrain (HAAT) is 267 meters. The maximum effective radiated power of 100.0 kW, for a television facility located in Zone 1, is proposed herein. Attached as Exhibit 1 is a vertical plan antenna sketch depicting all pertinent elevations.

A type-approved transmitter of adequate power to achieve the required transmitter power output will be installed at the time of construction.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.684 of the Rules, utilizing the appropriate F(50,50) propagation curves (47 C.F.R. §73.699, Figure 9), power, and antenna height above average terrain as determined for each profile radial. The average terrain, on the eight cardinal radials from 3 kilometers to 16 kilometers from the proposed site, was determined using the National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in FCC Rules. The terrain data contained herein supersedes the data currently on file for the existing site which was derived from topographic maps. The antenna site elevation was determined using a U.S. Geological Survey 7.5 minute topographic map.

The predicted City-Grade (74 dBu), Grade A (68 dBu) and Grade B (47 dBu) coverage contours for the proposed operation are shown in Exhibit 3. The distance to contours were calculated as described above and verified using the FCC's "Curves" computer program. As Exhibit 3 shows, the 74 dBu contour completely encompasses the principle community of license, Baltimore, Maryland.

The following information pertaining to antenna performance was calculated in accordance with section 73.684(c)(1) of the FCC Rules.

STATEMENT OF HERMAN E. HURST, JR.  
NEW TV STATION - BALTIMORE, MARYLAND  
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| <u>AZIMUTH</u> | <u>HAAT<br/>(Meters)</u> | <u>DEPRESSION<br/>ANGLE (Ah)</u> | <u>RELATIVE<br/>FIELD</u> | <u>ERP<br/>(dBk)</u> |
|----------------|--------------------------|----------------------------------|---------------------------|----------------------|
| 0°             | 220                      | 0.41                             | 1.00                      | 20.0                 |
| 45°            | 249                      | 0.44                             | 1.00                      | 20.0                 |
| 90°            | 322                      | 0.50                             | 1.00                      | 20.0                 |
| 135°           | 320                      | 0.50                             | 1.00                      | 20.0                 |
| 180°           | 296                      | 0.48                             | 1.00                      | 20.0                 |
| 225°           | 252                      | 0.44                             | 1.00                      | 20.0                 |
| 270°           | 235                      | 0.42                             | 1.00                      | 20.0                 |
| 315°           | 238                      | 0.43                             | 1.00                      | 20.0                 |

Since the relative field at the pertinent vertical angle for each azimuth exceeds 90% of the maximum relative field, maximum effective radiated power was used in determining distances to the Grade A, Grade B, and City Grade service coverage contours.

BLANKETING AND INTERMODULATION INTERFERENCE

Radio station WPOC(FM), Baltimore, Maryland, would be colocated with the proposed television facility. In the event that blanketing interference occurs with this or any other facilities which have not been identified, the applicant will take appropriate steps to minimize the interference within the blanketing contour. Further, the applicant accepts the responsibility to alleviate any new intermodulation interference, including receiver induced, resulting from the instant proposal combined with a broadcast facility located within ten kilometers of the proposed site.

STATEMENT OF HERMAN E. HURST, JR.  
NEW TV STATION - BALTIMORE, MARYLAND  
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In accordance with the Commission's January 2, 1991, decision (FCC 91-3, Released January 14, 1991) regarding the application of WK LX, Inc., the applicant will exclude both mobile and battery-powered receivers from Receiver Induced Third Order Intermodulation and Blanketing Interference Resolution Requirements. In the event any

STATEMENT OF HERMAN E. HURST, JR.  
NEW TV STATION - BALTIMORE, MARYLAND  
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FAA NOTIFICATION

Because the overall height of the existing tower structure will not be altered, the Federal Aviation Administration was not notified of the proposed construction.

ENVIRONMENTAL CONSIDERATIONS

GENERAL

The proposal described herein meets the criteria specified in Section 1.1306 of the FCC Rules and Regulations as an action which is categorically excluded from environmental processing. The proposed TV facility involves neither a site location specified under Section 1.1307(a)(1)-(7) of the Rules nor high intensity lighting as specified in Section 1.1307 (a)(8).

RADIOFREQUENCY IMPACT

Effective January 1, 1986, the FCC amended its Rules and Regulations to expand the manner in which the agency implemented the National Environmental Policy Act of 1969 (NEPA). This Commission action established procedures for evaluating the significance of radiofrequency (RF) radiation upon the environment from an FCC-regulated transmission facility. The adopted guidelines with respect to human exposure were those issued in 1982 by the American National Standards Institute (ANSI). In October 1985, the FCC issued OST Bulletin No. 65, entitled "Evaluating Compliance

with FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation," to aid in the radiation exposure analysis. This Bulletin is based on the ANSI guideline as well as other current literature including models contained in the Environmental Protection Agency's "An Engineering Assessment of the Potential Impact of Federal Radiation Protection Guidance on the AM, FM, and TV Broadcast Service." The Bulletin describes procedures for conducting an analysis including mathematical equations that can be used to determine compliance with the Commission's guidelines. The ANSI guideline value (Table 1, Appendix A) is 1.0 milliwatt per centimeter squared ( $\text{mW}/\text{cm}^2$ ) for TV Channel 2 facilities and all FM facilities.

Because the proposed antenna will be colocated with WPOC(FM), the proposed transmitter site is considered to be a multiple-use site. The power density contribution from each facility must be calculated individually, the fraction of the ANSI guideline value for each facility determined, and finally, the sum of the fractional contributions totaled. To comply with the FCC radiofrequency radiation requirements, this total should not exceed 100% of the ANSI guideline value.

The proposed TV facility will operate with an antenna radiation centerline of 198 meters AGL, with an visual ERP of 100.0 kW. Based on "worst-case" considerations, the new television facility will produce a predicted power density at two meters above ground level of  $0.043 \text{ mW}/\text{cm}^2$ .

STATEMENT OF HERMAN E. HURST, JR.  
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The existing WPOC(FM) antenna will be relocated to a point lower on the existing tower to accommodate the new Channel 2+ television antenna. The decrease in the height of the WPOC antenna will most likely be accompanied by an equivalent increase in ERP of the facility. Based on the "worst-case" consideration with an ERP of 19.90 kW and an antenna radiation centerline of 170 meters AGL (the ERP/HAAT combination is equivalent to a maximum Class B FM facility), the FM facility will produce a predicted power density at two meters above ground level of 0.047 mW/cm<sup>2</sup>. Considered together, the total contribution of both the proposed TV and modified FM facility would be 0.0906 mW/cm<sup>2</sup> or only 9.06 % of the ANSI guideline value, in compliance with the Commission's guidelines.

## OCCUPATIONAL SAFETY

Though the station's facilities will be operated by remote control, there are times when maintenance and repair tasks must be performed on equipment at the transmitter site. The applicant will institute joint measures with WPOC(FM) to ensure occupational safety. During times of tower maintenance, the stations will reduce power or go off-the-air as necessary to ensure there is no exposure to RF levels exceeding ANSI time-average guidelines.

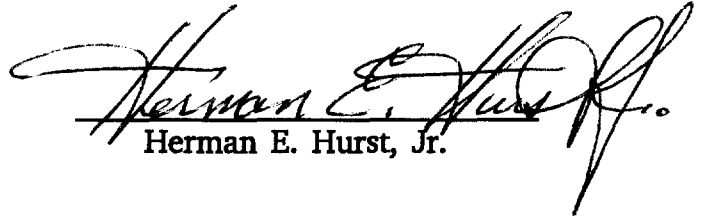
In light of the above, the proposed facility should be categorically excluded from

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SUMMARY

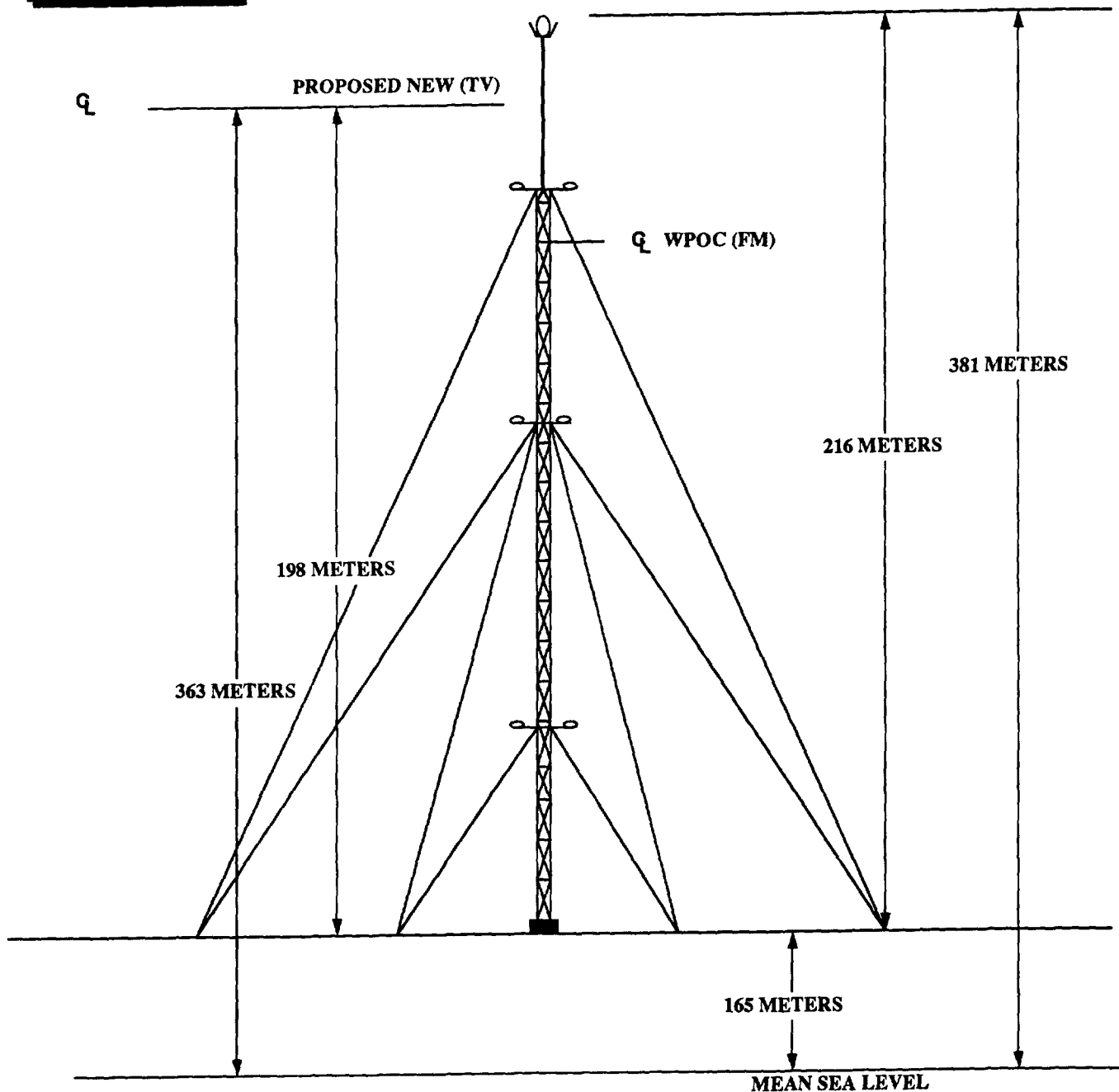
It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement, FCC Form 301, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: August 29, 1991

  
Herman E. Hurst, Jr.

NOTE: NOT DRAWN  
TO SCALE

EXHIBIT 1



COORDINATES  
N. LATITUDE: 39° 17' 13"  
W. LONGITUDE: 76° 45' 16"

**VERTICAL PLAN ANTENNA SKETCH**  
NEW (TV) STATION --- BALTIMORE, MARYLAND  
CH: 2+ --- 100 kW --- 267 M HAAT  
AUGUST, 1991

**CARL T. JONES**  
CORPORATION

# VERTICAL RADIATION PATTERN



STATION CHESAPEAKE TELEVISION INC.

Beam Tilt ..... 0.5 ..... Deg.

Channel ..... 2 .....

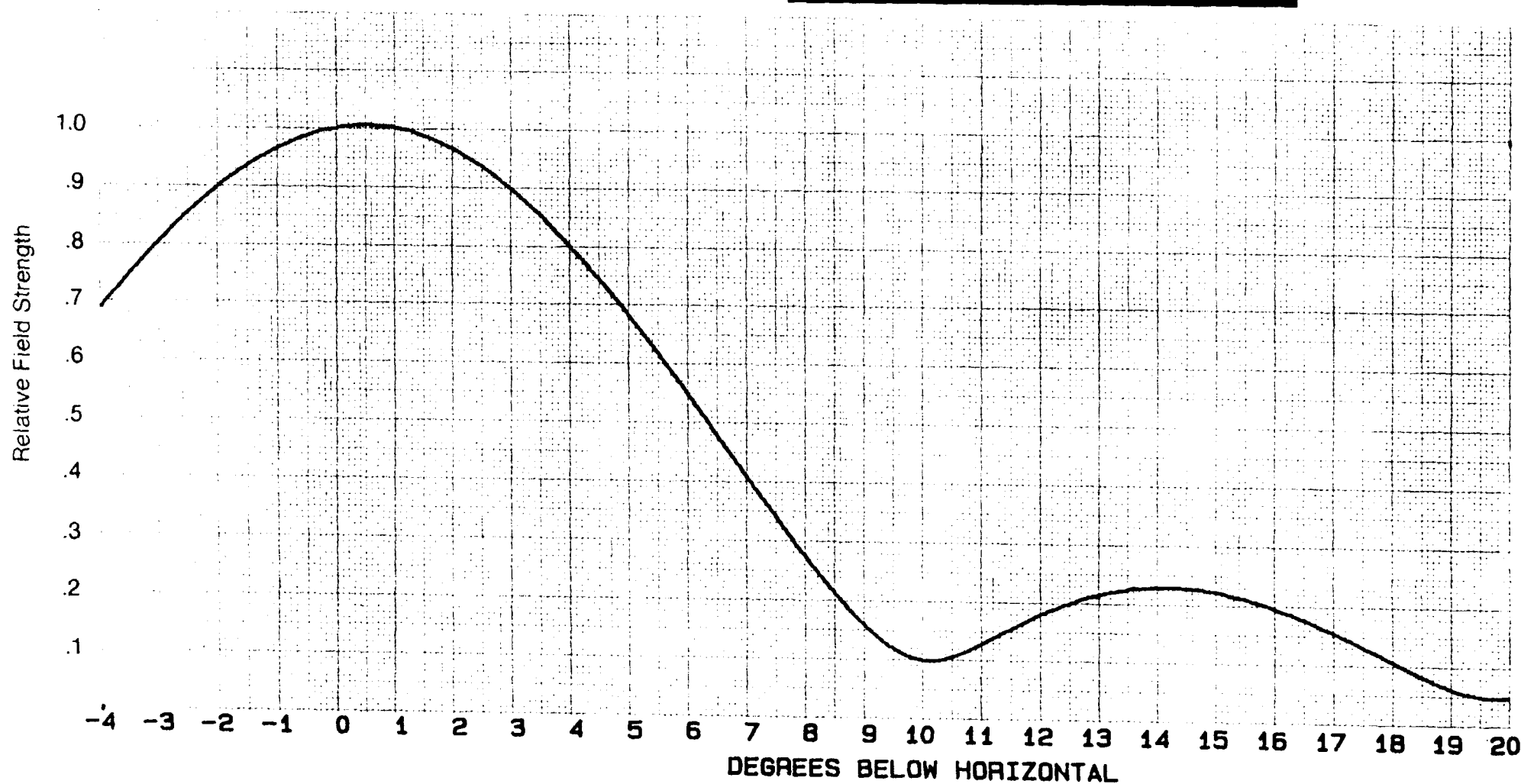
Null Fill Loss ..... 0.1 ..... dB.

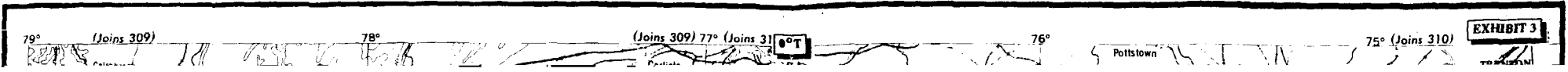
Frequency ..... 55.25 ..... MHz.

Face ..... ---- .....

Type ..... SUPERTURNSTILE .....

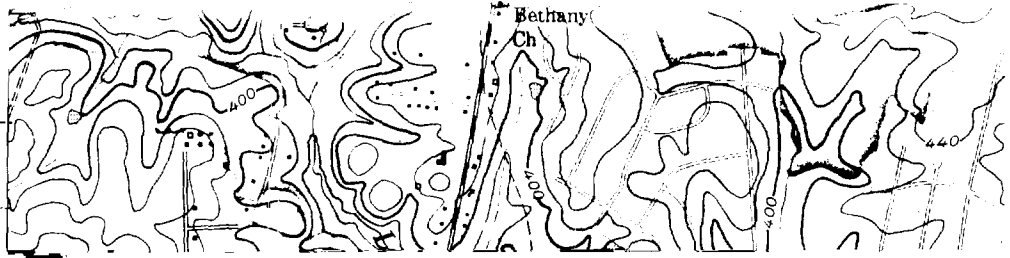
**VERTICAL PLANE RADIATION PATTERN**  
NEW TV STATION -- BALTIMORE, MARYLAND  
CH. 2+ -- 100.0 kW -- 267 m HAAT  
AUGUST, 1991





1750

4350



Bethany  
Ch

440

